

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JAN 19 2022

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELIZABETH N. BATES,

Defendant.

4:22CR018 AGF/SRW

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**(Unauthorized Use of Access Device)**

From on or about February 20, 2020, and continuing through on or about October 29, 2020,  
in the Eastern District of Missouri, the defendant,

**ELIZABETH N. BATES,**

did knowingly and with intent to defraud, used one or more unauthorized access devices, to wit, a Synchrony Bank credit card belonging to "R.R.," during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000.00 or more during that period, said conduct affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT TWO**

**(Unauthorized Use of Access Device)**

From on or about March 21, 2020, and continuing through on or about June 28, 2020, in

the Eastern District of Missouri, the defendant,

**ELIZABETH N. BATES,**

did knowingly and with intent to defraud, use one or more unauthorized access devices, to wit, Commerce Bank Visa debit card belonging to "F.P.," during any one-year period, and by such conduct did obtain anything of value aggregating \$1,000.00 or more during that period, said conduct affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT THREE**

**(Aggravated Identity Theft)**

On or about March 21, 2020, in the Eastern District of Missouri, the defendant,

**ELIZABETH N. BATES,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, Title 18 United States Code Section 1029(a)(2) (access device fraud), did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the name of "F.P.," knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL.

\_\_\_\_\_  
FOREPERSON

SAYLER A. FLEMING  
United States Attorney

\_\_\_\_\_  
JENNIFER J. ROY #47203MO  
Assistant United States Attorney